

CLERK US DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2018 DEC -6 AM 9:48

CLERK

NT

UNITED STATES OF AMERICA

Plaintiff,

v.

NO. 3:18-MC 90-N

\$31,935.00 IN U.S. CURRENCY,

Defendant in rem.

**JOINT MOTION TO EXTEND
TIME TO FILE JUDICIAL FORFEITURE ACTION**

The United States of America and Claimant Turan Alakbarov, through his attorney of record, Victor Shulov, jointly move, pursuant to 18 U.S.C. § 983(a)(3)(A), for a 30-day extension of time to file a judicial action regarding property to which Alakbarov has filed a claim in an administrative forfeiture proceeding with the Drug Enforcement Administration (DEA), and in support state:

1. DEA seized \$31,935.00 in U.S. Currency on or about July 5, 2018, at DFW International Airport, 2400 Aviation Drive, DFW Airport, Texas.

2. DEA sent written notice of intent to forfeit the seized property to all potentially interested parties as required by 18 U.S.C. § 983(a)(1)(A). On September 10, 2018, Turan Alakbarov, through his attorney of record, Victor Shulov filed a claim to the property with the DEA.

3. No other person has filed a claim to the property, and the time to do so under 18 U.S.C. § 983(a)(2)(A)-(E) has expired.

4. According to 18 U.S.C. § 983(a)(3)(A)-(C), the United States is to file a judicial forfeiture action no later than 90 days after a claim has been filed or return the seized property pending such filing, except that a court may extend the filing period for good cause shown or upon agreement of the parties.

5. Unless the court extends the judicial filing deadline for good cause or upon agreement of the parties, the 90-day period that began with Victor Shulov's claim expires on December 9, 2018.


6. The parties have agree to extend the time for filing a judicial action for 30 days, to and including January 8, 2019.


CONCLUSION

Therefore, the parties request an order to extend the filing period for a judicial forfeiture action to and including January 8, 2019.

Respectfully submitted,

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